

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

MAR 28 1988

**SUBJECT:** ACTION MEMORANDUM: Authorization for Funding of Potentially Responsible Party Remedial Investigation/Feasibility Study (RI/FS) Oversight Activities for the Nease Chemical Site in Salem, Ohio

**FROM:** Basil G. Constantelos, Director  
Waste Management Division

**TO:** Valdas V. Adamkus  
Regional Administrator

PURPOSE

The purpose of this action memorandum is to request authorization to fund Potentially Responsible Party (PRP)-RI/FS oversight activities utilizing the ARCS Contractor, Black and Veatch, at the Nease Chemical site in Salem, Ohio.

This is a Federal Enforcement-lead RI/FS. The FY '88-02 advice of allowance for CERCLA Enforcement includes \$200,000 for this purpose. This request is to authorize the \$200,000 for RI/FS oversight activities on a CERCLA 122-Administrative Order by Consent (Consent Order) PRP RI/FS.

BACKGROUND

From 1961 until 1973, the Facility was owned and operated by Nease Chemical Company as a chemical manufacturing plant producing chemicals such as pesticides, fire retardants, household cleaning compounds and chemical intermediates used in agricultural, pharmaceutical and other chemical products. The plant was closed in 1973, by OEPA due to wastewater discharge violations. Some wastes from the plant processes were put into 55-gallon drums, which were buried on-site. Also, wastes were placed in 5 unlined lagoons as part of wastewater treatment. Since the Facility ceased operation in 1973, the Respondent has performed remedial actions including removal and off-site disposal of a partial excavation of a pond, two highly contaminated on-site areas, on-site drums, and a portion of a drainage ditch. Human exposure, if any, to hazardous substances would most likely be via ingestion of drinking water from potentially contaminated groundwater supplies, exposure to contaminated surface water or sediments and their related pathways, and contaminated surface soils.



### ESTIMATED PROJECT COST AND SCHEDULE

	<u>Additional Costs</u>	<u>Duration</u>
Remedial Investigation Oversight	\$160,000	12 months
Feasibility Study Oversight	40,000	4 months
Total	\$200,000	16 months

### PROPOSED PROJECT

The Remedial Investigation PRP oversight activities will determine if the PRP via a Consent Order will properly define the nature and extent of contamination on-site and leaving the site. It will allow the oversight of the PRP's as they evaluate groundwater, surface water, soil and sediment contamination in the area and characterize hydro-geological conditions.

The Feasibility Study PRP oversight activities will oversee the PRPs as they evaluate the screening of alternatives for source control and/or off-site remedial actions in accordance with Section 300.68 of the National Contingency Plan (NCP). Detailed analyses of feasible alternatives will include the evaluation of engineering cost estimates, constructability, technical reliability and an assessment of the relative impacts on public health, welfare and the environment.

### STATE PARTICIPATION

The State of Ohio has played an active role in the development of the SOW and supports the proposed oversight activities.

### REVIEWS

Regional and Headquarters reviews of this proposal indicate that the proposed SOW satisfies the intent of Section 104 of CERCLA and the National Oil and Hazardous Substances Contingency Plan.

### ENFORCEMENT STATUS

On January 27, 1988, Ruetgers-Nease Chemical Company, which is the sole Potentially Responsible Party (PRP) at the Nease Chemical NPL site in Salem, Ohio entered into a three (3) party CERCLA 122-Administrative Order by Consent with U.S. EPA and OEPA for the PRP to conduct an RI/FS at the Nease Chemical site. This site is designated as an enforcement-lead Category II site.

REMEDIATION PROJECT MANAGER

I have designated Daniel J. Ricknell, CERCLA Enforcement Section, Emergency and Remedial Response Branch to be the Remedial Project Manager for this site. He can be reached at FTS-386-7341.

RECOMMENDATION

This request has been coordinated with the appropriate offices in Region V and Headquarters. I recommend that you authorize the obligation as specified for Nease Chemical RI/FS oversight activities. Attached for your signature is a Procurement Request which will be forwarded to the appropriate offices for formal obligation of funds. I am available to discuss this request in more detail at your convenience.

Attachments

cc: D. Stutz, PM-214-F  
B. Quinn, WH-548-E  
D. Gerst, WH-527  
C. Taylor, OEPA  
D. Bruce, CES

bcc: M. Berman, ORC  
G. Kulma, SMS  
D. Potter, SMA  
J. Hall, OPA  
PSS Files